

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JOSEPH A. DAOU and KAREN M. DAOU,

Plaintiff,

v.

BLC BANK, S.A.L., CREDIT LIBANAIS,  
S.A.L., AL-MAWARID BANK, S.A.L., and  
BANQUE DU LIBAN,

Defendants.

Case No. 1:20-cv-4438-DLC

**REPLY DECLARATION OF JEFFREY D. ROTENBERG  
IN FURTHER SUPPORT OF DEFENDANTS BLC BANK, S.A.L. AND CREDIT  
LIBANAIS, S.A.L.’S MOTION TO DISMISS PLAINTIFFS’ FIRST AMENDED  
COMPLAINT**

JEFFREY D. ROTENBERG declares pursuant to 28 U.S.C. § 1746:

1. I am a member of the bar of the State of New York and am admitted to the bar of this Court. I am a partner with the law firm of DLA Piper LLP (US), attorneys for Defendants BLC Bank, S.A.L. (“BLC”), and Credit Libanais, S.A.L. (“CL”).

2. This reply declaration, together with the attached exhibits, is being submitted in further support of BLC and CL’s Motion to Dismiss plaintiffs Joseph Daou and Karen Daou’s (“Plaintiffs”) First Amended Complaint (*see* ECF No. 50).

3. Attached hereto as Exhibit 1 is a true and correct copy of the Declaration of Patrick Soumrahi, Lebanese legal expert, dated and duly executed January 6, 2021.

4. Attached hereto as Exhibit 2 is a true and correct copy of the Declaration of Nasri Antoine Diab, Lebanese legal expert, dated and duly executed January 7, 2021

5. Attached hereto as **Exhibit 3** is a true and correct copy of the Council of Foreign Relations webpage, “What Is Hezbollah?” by Kali Robinson, dated September 1, 2020, last accessed January 8, 2021, and publicly available at <https://www.cfr.org/backgrounder/what-hezbollah>.

6. Attached hereto as **Exhibit 4** is a true and correct copy of the U.S. Department of State Overseas Security Advisory Council’s (“OSAC”) “Lebanon 2016 Crime & Safety Report,” dated March 14, 2016, last accessed January 8, 2021, and publicly available at <https://www.osac.gov/Content/Report/8dca5a92-4716-4092-8459-15f4adcae242>.

7. Attached hereto as **Exhibit 5** is a true and correct copy of OSAC’s “Travel Advisory: Lebanon - Level 3 (Reconsider Travel),” dated October 19, 2019, last accessed January 8, 2021, and publicly available at <https://www.osac.gov/Country/Lebanon/Content/Detail/Report/cd211f78-e979-4166-91ce-170f207e725b>.

8. Attached hereto as **Exhibit 6** is a true and correct copy of OSAC’s “Travel Advisory: Lebanon - Level 3 (Reconsider Travel),” dated September 4, 2018, last accessed January 8, 2021, and publicly available at <https://www.osac.gov/Country/Lebanon/Content/Detail/Report/3a5a2da4-a8fe-4c1e-9a88-15f4ae859164>.

9. Attached hereto as **Exhibit 7** is a true and correct copy of the Board of Governors of the Federal Reserve System’s Webpage, “Supervision and Regulation,” dated January 7, 2021, last accessed January 8, 2021, and publicly available at <https://www.federalreserve.gov/supervisionreg.htm>.

10. Attached hereto as **Exhibit 8** is a true and correct copy of the Declaration of Makram Sader, Secretary General of the Association of Banks in Lebanon, dated and duly executed January 6, 2021.

Dated: January 8, 2021  
New York, New York

/s/ *Jeffrey D. Rotenberg*  
Jeffrey D. Rotenberg

**CERTIFICATE OF SERVICE**

I hereby certify that I am one of the attorneys for the defendant in this action and that on January 8, 2021, I caused a copy of the foregoing to be filed with the Court's ECF system, which will cause notice of its filing to be served electronically upon all counsel who have appeared in this action.

/s/ Jeffrey D. Rotenberg  
Jeffrey D. Rotenberg